

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**Carroll Independent School District,**

*Plaintiff,*

v.

**United States Department of Education,  
et al.,**

*Defendants.*

**Case No. 4:24-cv-00461-O**

**PARTIES' JOINT NOTICE OUTLINING BRIEFING SCHEDULE FOR  
MOTION TO DELAY EFFECTIVE DATE AND FOR  
PRELIMINARY INJUNCTION**

Pursuant to Court's Order of May 21, 2024 (ECF No. 7), Plaintiff Carroll Independent School District and Defendants United States Department of Education, Miguel Cardona, Catherine E. Lhamon, United States Department of Justice, Merrick B. Garland, and Kristen Clarke (the Parties) respectfully submit the following joint notice outlining the agreed briefing schedule:

1. Plaintiff filed its motion for preliminary injunction (ECF No. 15) on May 30, 2024.
2. Defendants will file their response by June 20, 2024.<sup>1</sup>
3. Plaintiff will file its reply by July 5, 2024, or five days in advance of the hearing on the motion, whichever is sooner.

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<sup>1</sup> Defendants respectfully note that they are planning to move to consolidate this case with *Texas v. United States*, No. 2:24-cv-00086-Z (N.D. Tex. 2024), an earlier filed case brought by the State of Texas, of which Carroll Independent School District is a political subdivision. See Am. Compl. ¶ 167, *Texas v. United States*, No. 2:24-cv-00086-Z (N.D. Tex. May 13, 2024), ECF No. 12. Carroll Independent School District has informed Defendants that it opposes such consolidation. Defendants therefore have agreed to the schedule proposed above in the event their anticipated motion for consolidation is denied.

4. The Parties propose that the Court schedule oral argument during the week of July 1–5 or the week of July 8–12.

5. The Parties agree that no evidentiary hearing on the motion is necessary.

Respectfully submitted this 31 day of May, 2024.

*/s/ Elizabeth Tulis*

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*/s/ Natalie D. Thompson*

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members while application is pending.*

**CERTIFICATE OF SERVICE**

I certify that on May 31, 2024, this document was served on all counsel of record via the Court's CM/ECF system and on counsel for defendants via email at Elizabeth.Tulis@usdoj.gov.

/s/ Natalie D. Thompson

Natalie D. Thompson  
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